

ARNOLD ALCANTAR
310 POULTNEY PLACE
NEW MARKET, MD. 21774

Plaintiff

v.

COSTCO WHOLESALE
10 MONOCACY BLVD
FREDERICK, MD 21704
SERVE ON:
THE CORPORATION TRUST
2405 YORK ROAD
LUTHERVILLE, MD 21093

Defendant

* IN THE
* CIRCUIT COURT
* FOR
* FREDERICK COUNTY

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* Case No.: C-10-CV-20-000096
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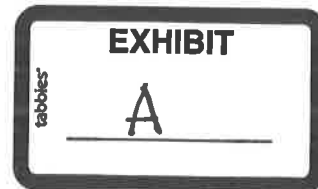
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COMPLAINT

Plaintiff, Arnold Alcantar, by and through his attorneys, Seigel & Rouhana, LLC, and Paul N. Rouhana, files this action against the Defendants Costco Wholesale, and says:

1. On or about April 29, 2018, the Plaintiff, Arnold Alcantar, was lawfully on said premises, a department store, as a business invitee thereof.
2. On that date and at that location, the Plaintiff and an employee of the Defendant, were loading a BBQ pit into Plaintiff's vehicle, when Plaintiff sustained injury due to the negligence of Defendant's employee and Defendant in loading same.
3. As a direct and proximate result of the negligence of the Defendant, the Plaintiff was caused to suffer and sustain serious, painful, and permanent injury about the head, neck, and body, and limbs.
4. The Plaintiff was rendered sick, sore, and disabled.
5. The Plaintiff has incurred and will incur hospital, medical, and other expenses.
6. The Plaintiff has and will suffer physical and emotional pain and suffering.



7. The Plaintiff, Arnold Alcantar, has lost and will lose time from his gainful employment and usual avocations.

8. The Plaintiff was otherwise injured and damaged.

9. No conduct on the part of the Plaintiff contributed to the accident or to the injuries sustained by him.

10. Plaintiff, Arnold Alcantar, re-alleges all allegations contained above.

WHEREFORE, the Plaintiff, Arnold Alcantar, demands judgment against the Defendant, Costco Wholesale, in an amount in excess of \$75,000.00, plus interest and costs of this action.

/s/ Paul N. Rouhana

Paul N. Rouhana (CPF No.: 0212190106)

Seigel & Rouhana, LLC

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